

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

NO: 1:15-cr-00102-LM

MICHAEL BOUGIE

ASSENTED TO MOTION TO CONTINUE

NOW COMES the Defendant, Michael Bougie, by and through counsel, and hereby moves this Court to continue his March 25, 2016 Final Pre-Trial and his April 5, 2016 Trial for an additional 45 days.

In support of this Motion, the Defendant states as follows:

1. The Defendant is scheduled to appear in this Court for his Final Pre-Trial on March 25, 2016 at 10:00 a.m. and is scheduled for his Trial on April 5, 2016 at 9:30 a.m.;
2. However, both Parties just came to a Plea Agreement and need additional time to work out the details. The finalized Plea Agreement also needs to be approved within the US Attorney's Office;
3. Additionally, the undersigned counsel is on vacation April 21, 2016 through May 1, 2016. The undersigned counsel is also scheduled for a CJA Day on May 3, 2016 in US District Court in Boston, MA. Additionally, the undersigned counsel is scheduled for a Trial, Commonwealth v. K. Mateja, on May 5, 2016 which has a no further continuance order
4. That the Prosecutor, Assistant US Attorney Jennifer Davis, has been contacted and assents to this Motion to Continue.

WHEREFORE, the Defendant, Michael Bougie, respectfully requests that this Court grant this Motion to Continue and continue his Final Pre-Trial and Trial for an additional 45 days.

Respectfully submitted
Michael Bougie,
By his Attorney,

Date: March 24, 2016

/s/ Paul J. Garrity_____
Paul J. Garrity
Bar No. 905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 24th day of March, 2015, a copy of the within Assented Motion to Continue was e-filed for Assistant US Attorney Jennifer Davis.

/s/ Paul J. Garrity_____
Paul J. Garrity